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CLERK, U.S. DISTRICT COURT
ANCHORAGE, A.K.

Nathanael Jenkins
Name
5000 Taku Drive
Mailing address
Anchorage, AK, 99508
City, State, Zip
907-538-4343
Telephone

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ALASKA

Nathanael Jenkins
(Enter full name of plaintiff in this action)

Plaintiff,

vs.

ACDA/Easy Post
(Enter full names of defendant(s) in this action.
Do NOT use *et al.*)

Defendant(s).

Case No. 3:20-cv-00217-SLG
(To be supplied by Court)

COMPLAINT UNDER
THE CIVIL RIGHTS ACT
42 U.S.C. § 1983

(NON-PRISONERS)

A. Jurisdiction

Jurisdiction is invoked under 28 U.S.C. § 1343(a)(3) and 42 U.S.C. § 1983. If you assert jurisdiction under any different or additional authorities, please list them below:

B. Parties

1. Plaintiff: This complaint alleges that the civil rights of Nathanael Jenkins
(print your name)
who presently resides at 5000 Taku Dr Anchorage, AK
(mailing address)

were violated by the actions of the individual(s) named below.

2. **Defendants** (Make a copy of this page and provide same information if you are naming more than 3 defendants):

Defendant No. 1, ACDA / Easy Park is a citizen of Alaska, and is employed as a Business & Parking Authority
(name) (state) (defendant's government position/title)

☒ This defendant **personally participated** in causing my injury, and I want **money damages**.

OR

☐ The **policy or custom** of this official's government agency violates my rights, and I seek **injunctive relief** (to stop or require someone do something).

Defendant No. 2, _____ is a citizen of _____, and is employed as a _____.
(name) (state) (defendant's government position/title)

☐ This defendant **personally participated** in causing my injury, and I want **money damages**.

OR

☐ The **policy or custom** of this official's government agency violates my rights, and I seek **injunctive relief** (to stop or require someone do something).

Defendant No. 3, _____ is a citizen of _____, and is employed as a _____.
(name) (state) (defendant's government position/title)

☐ This defendant **personally participated** in causing my injury, and I want **money damages**.

OR

☐ The **policy or custom** of this official's government agency violates my rights, and I seek **injunctive relief** (to stop or require someone do something).

C. Causes of Action (You may attach additional pages alleging other causes of action and facts supporting them if necessary. Make copies of page 5 and rename them pages 5A, 5B, etc. and rename the claims, "Claim 4," "Claim 5, etc.").

A
Claim 1: On or about May 12, 2017, my civil right to
anti-discrimination (Date)

(due process, freedom of religion, free speech, freedom of association and/or assembly, freedom from cruel and unusual punishment, etc. List **only one** violation.)

was violated by ACDA/Easy Park
(Name of the specific Defendant who violated this right)

Supporting Facts (Briefly describe facts you consider important to Claim 1. State what happened briefly and clearly, in your own words. Do not cite legal authority or argument. Describe exactly what each defendant, by name, did to violate the right alleged in Claim 1.):

After experiencing derogatory comments of a sexual nature, I engaged in a protected activity with ACDA/Easy Park. While engaged in the protected activity, I experienced an altercation (retaliation) I was forced by the situation to document the retaliation over audio recording. The witness in the audio was aware that there was an ongoing investigation. The witness in the audio had been submitted as a witness in the investigation. The witness in the audio verbally confirms they had heard me be called a "snitch" for reporting ACDA/Easy Park's employee for a hostile work environment for experiencing derogatory comments of a sexual nature from ACDA/Easy Park's employee.

The witness in the audio verbally confirms the context of the name calling (retaliation) altercation.
The witness in the audio recording verbally confirms the context telling me that the retaliation was upset because previously a different co-worker/employee of ACDA/Easy Park had reported him for similar reasons.
The witness in the audio verbally confirms

B
Claim 1: On or about May 12, 2017, my civil right to
anti-discrimination (Date)

(due process, freedom of religion, free speech, freedom of association and/or assembly, freedom from cruel and unusual punishment, etc. List **only one** violation.)

was violated by ACDA / Easy Pease
(Name of the specific Defendant who violated this right)

Supporting Facts (Briefly describe facts you consider important to Claim 1. State what happened briefly and clearly, in your own words. Do not cite legal authority or argument. Describe exactly what each defendant, by name, did to violate the right alleged in Claim 1.):

Mentioning the Name of the employee who had previously reported the retaliator And that was why the witness. I was aware of the context of why I had been called a switch After engaging in a protected activity, after experiencing derogatory comments of a sexual nature. I asked questions & probed further to get a verbal account of witness to why I had experienced Retaliation by being called a switch. I repeated the Name of a previous reporter & the witness verbally gave confirmation After I repeated the previous reporters Name. The witness : Verbally confirmed an ACDA employee previously reporting the retaliator, which was why I had been called a switch. Asking multiple times the witness : Confirms Retaliation & takes the stance of retaliation by telling me not to "egg it on". Referring to the situation. An experience of retaliation that I had documented. An experience of an altercation (retaliation) during a protected Activity

C
Claim 1: On or about May 12, 2017, my civil right to
Anti-Discrimination (Date)

(due process, freedom of religion, free speech, freedom of association and/or assembly, freedom from cruel and unusual punishment, etc. List **only one** violation.)

was violated by ACDA/Easy Park
(Name of the specific Defendant who violated this right)

Supporting Facts (Briefly describe facts you consider important to Claim 1. State what happened briefly and clearly, in your own words. Do not cite legal authority or argument. Describe exactly what each defendant, by name, did to violate the right alleged in Claim 1.):

The witness in the audio states they would "speak" to the retaliator during the retaliation. The witness confirms that they had already spoken to the retaliator during the retaliation. Subsequently the protected activity. The witness in the audio confirms that the witness the retaliator had participated in Retaliation while I was engaged in a protected activity.

Claim 2: On or about May 12, 2017, my civil right to
(Date)
ANTI-DISCRIMINATION

(due process, freedom of religion, free speech, freedom of association and/or assembly, freedom from cruel and unusual punishment, etc. List **only one** violation.)
was violated by ACDA/Easy Park
(Name of the specific Defendant who violated this right)

Supporting Facts (Briefly describe facts you consider important to Claim 2. State what happened briefly and clearly, in your own words. Do not cite legal authority or argument. Describe exactly what each defendant, by name, did to violate the right alleged in Claim 2.):

After engaging in a protected activity the witness & the retaliators actions of Retaliation caused an adverse action to my employment. After engaging in a protected activity & documenting retaliation I was terminated based off of the witnesses & the retaliators Retaliation. ACDA/Easy Park terminated my employment based off of Retaliation where the witnesses & the retaliators actions caused an adverse action to my employment. The next day the witness & the Retaliator gave false statements resulting in an adverse action to my employment & subsequently my termination.

Claim 3: On or about May 12, 2017, my civil right to Anti-Discrimination (Date)
(due process, freedom of religion, free speech, freedom of association and/or assembly, freedom from cruel and unusual punishment, etc. List **only one** violation.)

was violated by ACDA/Easy Park
(Name of the specific Defendant who violated this right)

Supporting Facts (Briefly describe facts you consider important to Claim 3. State what happened briefly and clearly, in your own words. Do not cite legal authority or argument. Describe exactly what each defendant, by name, did to violate the right alleged in Claim 3.):

The full & entire audio of the file documentation of retaliation has not been reviewed by either the defendant, ACDA/Easy Park or a legal authority. While the contents of the audio file all edge retaliation & an adverse action by the participation of myself in a protected activity. The adverse action being termination, I was immediately terminated causal to the hostile work environment & retaliation. The audio file was never investigated by ACDA/Easy Park. While the altercation/retaliation was the reason I was terminated.

D. Previous Lawsuits

1. Have you begun other lawsuits in **state or federal court** dealing with the **same facts** involved in this action, **or otherwise relating to your imprisonment**? ____ Yes ____ No

2. If your answer is "Yes," describe each lawsuit.

a. Lawsuit 1:

Plaintiff(s): _____

Defendant(s): _____

Name and location of court: _____

Docket number: _____ Name of judge: _____

Approximate date case was filed: _____ Date of final decision: _____

Disposition: ____ Dismissed ____ Appealed ____ Still pending

Issues Raised: _____

b. Lawsuit 2:

Plaintiff(s): _____

Defendant(s): _____

Name and location of court: _____

Docket number: _____ Name of judge: _____

Approximate date case was filed: _____ Date of final decision: _____

Disposition: ____ Dismissed ____ Appealed ____ Still pending

Issues Raised: _____

F. Request for Relief

Plaintiff requests that this Court grant the following relief:

1. Damages in the amount of \$ 50,000,000

2. Punitive damages in the amount of \$ 1,000,000.00

3. An order requiring defendant(s) to _____

4. A declaration that _____

5. Other: _____

Plaintiff demands a trial by jury. Yes ☒ No

DECLARATION UNDER PENALTY OF PERJURY

The undersigned declares under penalty of perjury that s/he is the plaintiff in the above action, that s/he has read the above civil rights complaint and that the information contained in the complaint is true and correct.

Executed at Anchorage, AK on 9/4/2020
(Location) (Date)

[Signature]
(Plaintiff's Original Signature)

Original Signature of Attorney (if any) (Date)

Attorney's Address and Telephone Number